

JUL 07 2023

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

TIME: \_\_\_\_\_  
CLERK, U.S. BANKRUPTCY COURT  
MINNEAPOLIS, MINNESOTA  
Chapter 7

In Re:

JAMIE ANNE STEMPFLEY,

Debtor.

Bankruptcy Number: 23-60129 – MER

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**NOTICE FOR HEARING AND MOTION FOR EXTENSION OF TIME TO FILE  
OBJECTIONS TO DISCHARGE FOR GOOD CAUSE  
AUTHORIZING RULE 4004**

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- To: Richard Stermer, Trustee, via email to: “[rsterner@stermerlaw.com](mailto:rsterner@stermerlaw.com)” and via U.S. Mail to: J. Richard Stermer, Stermer & Sellner, Chtd., 102 Parkway Drive, P.O. Box 514, Montevideo, MN 56265:
- To: Jamie Anne Stempfley, above-named Debtor, via email to Respondent’s attorney at “[jesse@lifebacklaw.com](mailto:jesse@lifebacklaw.com)” and via U.S. Mail to: Jesse A. Horoshak, Lifeback Law Firm, P.A., 6445 Sycamore Court North, Maple Grove, MN 55369:

**NOTICE OF HEARING**

1. Creditor, Faith Riverstone, in the above referenced Bankruptcy Case, gives Notice of the 4004 Motion Hearing scheduled to be heard before this Court on **July 27, 2023 at 10:30**, or as soon after as Counsel and Parties may be heard, before the Honorable Michael E. Ridgeway, U.S. Bankruptcy Court Judge, at the following location:

**United States Courthouse and Federal Building  
Courtroom 7 West  
300 South 4th Street  
Minneapolis, MN 55415**

2. Creditor, Faith Riverstone, respectfully moves the Court under Bankruptcy Rule 4004(b)(1) for an extension of time to file an objection to discharge, for the good causes detailed below.
3. Any response to this motion must be filed and served not later than Saturday, July 22, 2023, which is five days before the time set for the hearing (including Saturdays, Sundays and holidays). UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

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Creditor's Rule 4004 Motion, July 7, 2023

4. This Motion for Extension of Time to File an Objection to Discharge is timely filed, pursuant to Rule 4004(b)(1).

**MOTION**

1. I, Faith Riverstone, Creditor in this Bankruptcy Case, am a disabled older adult, disabled by every means test (Federal, State, and County), and pursuant to my disability, I require the reasonable ADA accommodation of longer time to prepare, and to draft, and file documents. Therefore, I am humbly and respectfully asking for a good cause extension to file an Objection to Discharge in this Bankruptcy.
2. There are further good causes as follows:
3. The Debtor filed her Chapter 7 Bankruptcy as a "No-Asset" Bankruptcy. Many issues arise in how this Bankruptcy was drafted and filed, as well as in the Debtor's debts themselves, as many of the Debtor's debts were taken with no intent to pay them and to harm the Creditors, raising the question of whether Debtor is entitled the relief she is seeking. I believe that both the Trustee in this Bankruptcy Case, and I, are in agreement that we would like to keep this a simple Bankruptcy and not make it a long drawn out complicated Case.
4. To that end, the Trustee and I have agreed to Settlement Terms on or around June 30, 2023. The Trustee stated that he would draft the Settlement Agreement, however, has not yet provided me a copy, nor has he filed a Notice of Settlement into the Bankruptcy as of yet. As such, I humbly and respectfully move the Court to please allow us the time to settle my interest stake in this Bankruptcy.
5. Additionally, I am in the process of retaining an attorney to help navigate the settlement process, to advocate for me, and explain what these things mean to me on a practical level. That said, I am unsure at this point in time whether the Settlement alone will satisfactorily resolve the loans secured against my childhood home and/or what that process will look like,

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Creditor's Rule 4004 Motion, July 7, 2023

or whether discharge will create substantial harm to me, and until such a point as it is made clear to me the aspect of how the secured loans are affected, and/or not-affected, by this Bankruptcy and Settlement, I reserve and act herein to preserve my right to object to their discharge under 11 U.S.C. §523(a)(2),(4), and (6). Thus, before complicating this Bankruptcy in what may amount to a moot point (at least as far as I am concerned), I humbly and respectfully move this Honorable Court for additional time to determine whether I need to file an Objection to Discharge of the Secured Loans.


6. I, am informed and believe to be true, that the Trustee previously filed a Motion to extend time of the deadlines of this Bankruptcy for himself and Debtor, which was granted. However, it did not extend to me. As such, I am humbly and respectfully request the same extension.

For the foregoing reasons, I, Faith Riverstone, Creditor in this Bankruptcy Case, humbly and respectfully request the following relief:

- An extension of time to file an Objection to Discharge of the loans secured against my home, to give us time to settle.

**Verification**

I, Faith Riverstone, Creditor herein, and moving party in the foregoing Notice of Motion and Motion for Extension of Time to File an Objection to Discharge for Good Cause, declare under penalty of perjury, pursuant to Minnesota Statute, § 358.116, that everything I have stated herein is true and correct.

Signed: , Dated: July 7, 2023, in Hennepin County, in the State of Minnesota.

Faith Riverstone  
9001 Stanlen Road  
St. Louis Park, MN 55426  
Email: faithriverstone@yahoo.com  
Phone: 952-412-6657

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In Re:

Chapter 7

JAMIE ANNE STEMPFLEY,

Bankruptcy Number: 23-60129 – MER

Debtor.

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**CERTIFICATE OF SERVICE**

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STATE OF MINNESOTA,  
COUNTY OF HENNEPIN

I, FAITH RIVERSTONE, certify that on July 7, 2023, I served the Attached:

1. Notice of Motion and Motion under Rule 4004 For Extension of Time to File Objection For Good Cause;
2. Proposed Order For Extension of Time to File Objection For Good Cause; and
3. Certificate of Service,

To: Richard Stermer, Trustee, via email to: "[rstermer@stermerlaw.com](mailto:rstermer@stermerlaw.com)" and via U.S. Mail to: J. Richard Stermer, Stermer & Sellner, Chtd., 102 Parkway Drive, P.O. Box 514, Montevideo, MN 56265;

To: Jamie Anne Stempfley, above-named Debtor, via email to Respondent's attorney at "[jesse@lifebacklaw.com](mailto:jesse@lifebacklaw.com)" and via U.S. Mail to: Jesse A. Horoshak, Lifeback Law Firm, P.A., 6445 Sycamore Court North, Maple Grove, MN 55369.

Bankruptcy 23-60129-MER Service of Motion to Extend Time



Faith Riverstone  
To: Bankruptcy Trustee: Richard Stermer, [jesse@lifebacklaw.com](mailto:jesse@lifebacklaw.com), Faith Riverstone

Dear Parties,

I hereby serve you with the following:

1. Notice of Motion and Motion under Rule 4004 For Extension of Time to File Objection For Good Cause;
2. Proposed Order For Extension of Time to File Objection For Good Cause; and
3. Certificate of Service,

and will be sending you same in U.S. Mail

Sincerely,  
Faith Riverstone  
952-412-6657

Downloaded all attachments by e-sign



07-07-2023 - pdf



07-07-2023 - pdf



07-07-2023 - pdf

I declare under penalty of perjury that everything I have stated herein is true and correct, per Minnesota Statute. § 358.116.

Signed:

Dated: July 7, 2023, in Hennepin County, State of Minnesota.

Faith Riverstone  
9001 Stanlen Road  
St. Louis Park, MN 55426  
Email: [faithriverstone@yahoo.com](mailto:faithriverstone@yahoo.com)  
Phone: 952-412-6657

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In Re:

Chapter 7

JAMIE ANNE STEMPFLEY,

Debtor.

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**ORDER AUTHORIZING CREDITOR'S EXTENSION OF TIME TO FILE  
OBJECTIONS TO DISCHARGE FOR GOOD CAUSE  
PURSUANT TO FED. R. BANKR. P., RULE 4004**

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This matter came before the Court on the Motion of Faith Riverstone, Creditor, to allow her additional time to file objection/s to discharge, pursuant to Federal Rules of Bankruptcy Procedure 4004.

Based on the files and records,

IT IS HEREBY ORDERED:

1. Creditor, Faith Riverstone, will be allowed the following \_\_\_\_\_,  
additional time to file her objections to discharge, which will now be due by:

Date: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Dated: \_\_\_\_\_, 2023

BY THE COURT:

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Honorable, Michael E. Ridgway  
United States Bankruptcy Judge